

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JASON CARRODINE, ELI REISMAN, and  
KIMBERLY HUDSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

FLATIRON MEDIA, LLC and HASE.COM  
LLC f/k/a UNLIMITED TRAFFIC LLC  
d/b/a “Has Traffic”,

Defendants.

Case No. 1:22-cv-09660-JMF

**FLATIRON MEDIA, LLC’S NOTICE OF  
MOTION TO DISMISS PLAINTIFFS’  
FIRST AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the First Amended Complaint by Defendant Flatiron Media, LLC (“Flatiron”), dated June 2, 2023, and all pleadings, submissions and proceedings herein, Flatiron hereby moves this Court before the Honorable Jesse M. Furman, United States District Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for the entry of an order dismissing Plaintiffs’ First Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: New York, New York.  
June 2, 2023

Respectfully submitted,

PERKINS COIE LLP

By: /s/ Dennis C. Hopkins

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